

TAKEROOT JUSTICE

June 3, 2020

VIA ECF

Hon. Barbara Moses, U.S.M.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Rahman et al. v. Red Chili Indian Cafe, Inc. et al.,
No. 17-cv-05156-RA-BCM

Dear Honorable Judge Moses,

Our office with Gangat LLC represents the Plaintiffs in the above referenced matter. We write pursuant to the Court's Order dated April 29, 2020 (Dkt. 97), which required Plaintiffs to submit a letter updating the Court on the status of Defendants' compliance with paragraphs 1 and 2 of the Order, which related to the production of IRS Forms 4506-T from each of the Defendants, and of documents required by the Court's February 27, 2020 Order (Dkt. 90). The Court also required Plaintiffs to propose a schedule for any remaining necessary discovery, including depositions.

After receipt of the Court's May 29, 2020 Order (Dkt. 100) which stated that the Defendants mailed certain documents to the Courthouse, I conferred today with Nadia Miah, who spoke on behalf of her father, Defendant Mohammed Miah, and I also conferred with Defendant Noor Islam.

As to the requirements of paragraph 1 of the April 29, 2020 Order, Plaintiffs received an executed IRS Form 4506-T from Mr. Miah on behalf of himself individually, and also on behalf of the corporate Defendant Red Chili Indian Café Inc. Plaintiffs did not receive an executed form from Mr. Islam. Plaintiffs then submitted the IRS Form 4506-T to the Internal Revenue Service requesting the tax transcripts from tax years 2015, 2016, 2017, and 2018 for Mr. Miah and the corporate Defendant. Per the IRS's policy, they will send the transcripts to the addresses of the taxpayers, Mr. Miah and Red Chili Indian Café, Inc., and Ms. Miah confirmed that once the transcripts are received, Defendants will share the transcripts with Plaintiffs.

As to the requirements of paragraph 2 of the April 29, 2020 Order, Plaintiffs have not received the documents required by the Court's February 27, 2020 Order. Ms. Miah confirmed to me that the Defendants mailed the documents to the Courthouse, and she confirmed that the Defendants will mail a hard copy set to the Plaintiffs, which we are awaiting.

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Regarding a proposed schedule for remaining discovery, Plaintiffs do not anticipate any further depositions but would like to review the discovery documents the Defendants are providing before proposing a specific schedule.

We kindly thank the Court for its time and attention to this matter.

Very truly yours

/s/ S. Tito Sinha
S. Tito Sinha

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